

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

----- X
UNITED STATES OF AMERICA,

Plaintiff,

- against –

ANTON NAPOLSKY,
also known as “Anton Napolskiy,” and

1:22-cr-00525-NRM-CLP

VALERIIA ERMAKOVA,

Defendants.

----- X

DEFENDANTS’ JOINT NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law in Support, Defendants Anton Napolsky and Valeriia Ermakova, by and through her undersigned attorneys, respectfully jointly move this Court, before the Honorable Nina R. Morrison, at the United States District Court, Eastern District of New York, for an order dismissing the Indictment and/or any other relief that the Court deems just and fit.

Dated: July 12, 2023

Respectfully submitted,

TEMKIN & ASSOCIATES, LLC

BROWN LEGAL CONSULTING, LLC

s/ Maria Temkin, Esq.

1700 Market Street, Suite 1005

Philadelphia, PA 19103

Telephone: (215) 939-4181

Email: maria@temkinlegal.com

Attorney for Defendant Valeriia Ermakova

Admitted Pro Hac Vice

s/ Anna V. Brown, Esq.

10 Rittenhouse Rd.

Frenchtown, NJ 08825

Telephone: (856) 357-4651

Email: anna@brownlegalconsulting.com

Attorney for Defendant Anton Napolsky

Admitted Pro Hac Vice

cc: Clerk of the Court (By ECF)
Counsel of Record (By ECF)